

From: Richard Bennett
To: Nancy Rumrill/R9/USEPA/US|||EPA
Cc: "Reiner, Jeff"
Date: 06/25/2009 12:42 PM
Subject: EPA role in UIC permitting in Hawaii

Dear Nancy.

I write you to seek some clarification. I see the EPA is taking the lead in the UIC permit process for the Lahina WWTP. Yet, I am under the impression that the state DOH UIC program is the permitting authority. Please clarify.

There is to be a workshop on injection wells on the Big Island sponsorec by the county water agency on July 22 in Kailua Kona. I hope you can be there as the speakers seem to be lined up to advocate for the ongoing use of injection wells for waste waters.

We at surfrider have expertise in hydrology and have the data the shows that most if not all ground water moves into the sea via a network of fissures and lava tubes. In our view this creates a "hydrologic connection" per the CWA. What is EPA's position in this regard. The USGS data from Kihei is very very clear. Waste water and its pollutant constituents move into the sea.

As you may know hawaiian waters are very nutrient limited and anthropogenic waste nutrient alter the ecosystem detrimentally. The list of 303 D impaired waters on the Kona coast grows with each cycle and are nearby to many injection wells. According to the CWA, adding more nutrients and pollutants in the watershed, even if it is underground yet hydrologically connected is prohibited. However the state and county seem to selectively ignore this provision of the CWA.

We await you responses.

Rick Bennett PhD, Chairman
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